



## APPENDIX "A".

CHAPTER II, SECTION 2 (a) (21) OF BANKRUPTCY ACT AS  
AMENDED.

"Creation of courts of bankruptcy and their jurisdiction.—a. The courts of the United States hereinbefore defined as courts of bankruptcy are hereby created courts of bankruptcy and are hereby invested, within their respective territorial limits as now established or as they may be hereafter changed, with such jurisdiction at law and in equity as will enable them to exercise original jurisdiction in proceedings under this Act, in vacation, in chambers, and during their respective terms, as they are now or may be hereafter held, to—

“• • •

“(21) Require receivers or trustees appointed in proceedings not under this Act, assignees for the benefit of creditors, and agents authorized to take possession of or to liquidate a person's property to deliver the property in their possession or under their control to the receiver or trustee appointed under this Act or, where an arrangement or a plan under this Act has been confirmed and such property has not prior thereto been delivered to a receiver or trustee appointed under this Act, to deliver such property to the debtor or other person entitled to such property according to the provisions of the arrangement or plan, and in all such cases to account to the court for the disposition by them of the property of such bankrupt or debtor: Provided, however, That such delivery and accounting shall not be required, except in proceedings under chapters 10 and 12 of this Act (Sections 501 to 676, 801 to 926 of this title), if the receiver or trustee was appointed, the assignment was made, or the agent was authorized more than four months prior to the date of bankruptcy. Upon such accounting, the court shall reexamine and determine the propriety and reasonableness of all disbursements made out of such property by such receiver, trustee, assignee, or agent, either to himself or to others, for services and ex-

penses under such receivership, trusteeship, assignment, or agency, and shall, unless such disbursements have been approved, upon notice to creditors and other parties in interest, by a court of competent jurisdiction prior to the proceeding under this Act, surcharge such receiver, trustee, assignee, or agent the amount of any disbursement determined by the court to have been improper or excessive.”

CERTIFICATE OF COUNSEL TO MOTION TO RECONSIDER.

This certifies that I am a member of the bar of the Supreme Court of the United States, and that in my opinion the foregoing motion to reconsider is well founded in point of equity as well as fact, and should be granted. I further certify that said motion is not made for purpose of delay, but in aid of justice; that said motion and cause are meritorious and are presented and urged in good faith, because the undersigned believes that a rehearing and reversal of this case should be granted upon the grounds of said motion and petitions, and that an *irreparable failure of administrative justice* will result to the certificate holders in Granada Estate, if the same be denied.

Dated March 15, 1941.

Respectfully submitted,

WEIGHTSTILL WOODS,  
*Counsel for Petitioner.*

